

GEORGE H. GOLDSTONE
ATTORNEY AND COUNSELLOR AT LAW

1010 BURNHAM ROAD
BLOOMFIELD HILLS, MICHIGAN 48304
(810) ~~434~~ 642-7673

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November 28, 1998

Federal Communications Commission
Washington, DC 20554

re: WT Docket No. 98-143

Dear Sirs:

With this letter, I enclose for filing eleven (11)
copies of my comment in the above docket proceeding.

Yours very truly,

George H. Goldstone
GEORGE H. GOLDSTONE

GHG/g

Encl (11)

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BEFORE THE

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, DC 20554

In the Matter of:

BIENNIAL REGULATORY REVIEW

Proposed Rulemaking to Amend
Part 97 of the Commission's
Amateur Radio Service Rules

WT Docket No. 98-143

RESPONSE OF GEORGE H. GOLDSTONE TO

NOTICE OF PROPOSED RULEMAKING

TO THE COMMISSION:

1. GEORGE H. GOLDSTONE, W8AP, an Amateur Radio Operator affected by the proposed rulemaking, (referred to herein as "Respondent") files these comments upon the Commission's proposal to simplify and otherwise modify Part 97 of its regulations governing the Amateur Radio Service.

2. Respondent has held an amateur radio operator and station license continuously since June, 1934. Since 1952, Respondent has held the Extra Class operator's license. He has been an active amateur radio operator during all of that time except for approximately 5 years in the United States Army during World War II. His military duties included service as Radio Officer of the 3rd Infantry Division.

3. Respondent concurs in the Commission's proposal to simplify the amateur radio license structure by eliminating the Novice and Technician Plus classes of license. Simplification of the licensing structure does not, however, require a reduction in entry level requirements. Respondent urges the following changes in Part 97:

- A. Beginners in amateur radio could start out with a Beginner's license, (to be called "Class D"), the examination for which would include no code test. Otherwise, the Class "D" examination would parallel the present Novice class examination.
- B. Class D licensees would be limited in power to 10 watts output, and to operating frequencies above 50 mHz. Permitted operating modes would be CW, AM, FM, SSB, and other modes as the Commission might consider appropriate.
 - a. The Commission might well note that in Japan, a beginners' license with a power limit of 10 watts has drawn hundreds of thousands of new radio amateurs into the hobby.

- b. While construction of a 10 watt transmitter is relatively simple, it might also be noted by the Commission that in Japan, radio manufacturers produce 10 watt versions of popular 100 watt transceivers. Low power transceivers are now being manufactured and marketed in the United States, in kit form and wired.
- C. A Class D licensee might pass a higher level technical examination and thereby obtain a "Technical Endorsement", which would authorize a power output of 100 watts.
- D. A Class D licensee might, in addition, pass a code test at 10 words per minute, and thereby earn a Class C license, (comparable to present General Class), with its frequency privileges.
- E. Respondent qualified for his first license in 1934 (then Class B, equivalent to the present General Class) by passing a code test of 10 words per minute. He knows of no reason for a requirement in excess of that speed for that class of license.

4. The General Class license would be re-designated the "Class C" license, with the same examination as the present General Class, except for a 10 word per minute code test. Power limits and frequency allocations would also remain the same.

5. The Advanced Class license would be re-designated the "Class B" license, with the same examination as the present Advanced Class, except for a 10 word per minute code test. Power limits would remain the same as at present. Class B licensees, as a major incentive for Class C licensees to upgrade to Class B, would receive an additional 25 kilohertz for radiotelephone operation on the 3.9, 7, 14, 21 and 28 MHz radiotelephone band segments. Power limits would remain the same.

6. The Extra Class license would be re-designated the "Class A" license, with the same examination as the present Extra Class. There would be no change in the present 20 word per minute code requirement.

A. The present provision of 25 kHz band edge segments now reserved for Extra Class licensees at the lower edge of the 3.5, 7.0, 14.0, 21.0, and 28.0 MHz bands is a major incentive for amateurs to achieve the highest level of

amateur license. These segments are quite narrow, and to efficiently use them, a code speed of 20 words per minute is not unreasonable. The slower the speed, the less information can be transmitted within a given time frame.

B. Were the Commission to lower the code speed required to qualify for a Class A license, it would proportionately reduce the information transmission capacity of those frequencies supposedly designated as an incentive for improvement of the amateur radio service. This contradicts previous declarations of the Commission, encouraging radio amateurs to increase their operating skills.

C. An influx of CW operators with no more than 12 word per minute code capability - as has been suggested by the American Radio Relay League in this proceeding - would substantially reduce the utility of these band segments for the thousands of Extra Class operators who have gained Extra Class privileges by acquiring and demonstrating 20 word per minute receiving and transmitting capability. There is no justification for reducing these privileges, which have provided a substantial incentive to the Amateur Radio Service for several decades. The incentive works well; it should be continued in its present form.

November 28, 1998

1010 Burnham Road
Bloomfield Hills, MI 48304-2973
(248) 642-7673

Respectfully submitted,


GEORGE H. GOLDSTONE